

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

FELICIA CHRISTIAN, Individually	:	
and as Administratrix of the Estate of JALIN	:	
TERRELL LAWSON; and JULLIA	:	
ALEXANDRIA MORRIS, Individually,	:	
	:	
Plaintiffs,	:	Civil Action File No.:
	:	4:22-cv-00062-CDL
v.	:	
	:	
FORD MOTOR COMPANY,	:	
	:	
Defendant.	:	

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**DEFENDANT FORD MOTOR COMPANY’S MOTION TO DISMISS**

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COMES NOW, Ford Motor Company (“Ford”), and within the time prescribed by law, moves this Court to dismiss Plaintiffs’ Complaint under Fed. R. Civ. P. 12(b)(6) and 12(b)(3) for failure to state a claim upon which relief can be granted as these claims are time barred and venue is improper. In support of this Motion, Ford relies upon the following:

1. Defendant Ford Motor Company’s supporting Memorandum of Law; and
2. All other pleadings and matters of record.

Ford respectfully requests that its Motion to Dismiss be **GRANTED** and that Plaintiffs’ claims against it be dismissed.

Respectfully submitted this 25<sup>th</sup> day of May, 2022.

WATSON SPENCE, LLP

**/s/ Michael R. Boorman**

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***Ford Motor Company***

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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This 25<sup>th</sup> day of May, 2022.

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